

## Richardson, Hetty L

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**From:** Dickson, Stephen M.  
**Sent:** Tuesday, September 26, 2006 4:48 PM  
**To:** Richardson, Hetty L  
**Cc:** Marvinney, Robert G.; Slovinsky, Peter A; Leyden, Kathleen  
**Subject:** PBR Ch 305 Changes to Coastal Sand Dunes - MGS Comments

Dear Ms. Richardson,

The Maine Geological Survey, Department of Conservation has reviewed the draft changes to Ch. 305, The Natural Resources Protection Act Permit by Rule Standards subject to Maine Department of Environmental Protection Rule-making Proposal currently open for comments. We suggest the changes included below in underscored and strikethrough text in the Ch. 305 proposed text (although there may be a better way to write this in the form of a few short sentences.) The section of text below was posted for comment on page 8.

### Section 16(B)(3)(c)

(c) For seawall repair or replacement only, an accurate plan drawn to scale by a licensed surveyor, coastal geologist or professional engineer showing the location of the existing and proposed wall (in Universal Transverse Mercator, State Plane, or Latitude and Longitude coordinates) and the elevation of the wall(s) surveyed in feet or meters referenced to the most recent vertical datum (e.g. NAVD88) and described in writing in relation to a nearby permanent ~~and reproducible~~ elevation control points, such as National Geodetic Survey, National Ocean Service, or Maine Department of Transportation benchmarks ~~a described point on a building or other structure~~. The plan must be signed and dated by the person responsible for preparing the drawing, and...

In effect, these changes will result in a permanent record of seawall dimensions in both a horizontal and a vertical framework that can be used in the permit review process with other topographic information such as dune or floodplain elevations. These changes will also provide the department with an accurate record of wall elevations that can be referred to in future seawall repair or replacement projects. These coordinates lend themselves to archiving in a geographic information system rather than in paper map files. This elevation information can be provided by the same professional that provides the plan drawings and should not significantly add to the cost of preparing an application.

Sincerely,

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